

CONFIDENTIAL VERSION

“
**” Designates Confidential Information.
Certain Schedules Attached to this Testimony Designated
“Confidential” Also Contain Confidential Information.
All Such Information Should Be Treated Confidentially.**

**BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

DIRECT TESTIMONY OF

ELIZABETH A. HERRINGTON

**ON BEHALF OF
EVERGY METRO, INC. d/b/a EVERGY KANSAS METRO**

**IN THE MATTER OF THE APPLICATION OF
EVERGY KANSAS METRO
FOR APPROVAL OF 2020 ACTUAL COST ADJUSTMENT (“ACA”)**

DOCKET NO. 21-EKME-____-ACA

1 **Q: Please state your name and business address.**

2 A: My name is Elizabeth A. Herrington. My business address is 1200 Main, Kansas City,
3 Missouri 64105-2122.

4 **Q: By whom and in what capacity are you employed?**

5 A: I am employed by Evergy, Inc. (“Company”) as Director, Power, Energy and Revenue
6 Accounting.

7 **Q: What are your responsibilities?**

8 A: As Director, Power, Energy and Revenue Accounting, I have responsibility for leading the
9 margin accounting team in support of the monthly close and external reporting processes.

1 The margin accounting team is responsible for the recording and analysis of all revenue,
2 fuel, purchased power and transmission transactions including the calculation of all fuel
3 clauses including the Energy Cost Adjustment.

4 **Q: Please describe your education, experience and employment history.**

5 A: I graduated from the University of Missouri-Columbia in May 1992 with a Bachelor of
6 Science in Accountancy. In October 1997, I joined the Company as a staff accountant and
7 have held several roles such as Supervisor - Accounts Receivable, Supervisor - Regulatory
8 Accounting, Manager - Revenue and Fuel Accounting, Manager - Energy Accounting,
9 Senior Manager – Accounting, and Director of Energy and Revenue Accounting before
10 assuming my current role.

11 **Q: Have you previously testified in a proceeding before the Kansas Corporation**
12 **Commission (“KCC” or “Commission”) or before any other utility regulatory**
13 **agency?**

14 A: Yes. I previously provided written testimony to the KCC for the 2015, 2016, 2017, 2018
15 and 2019 ACA and provided both written and oral testimony before the Missouri Public
16 Service Commission in the Company’s general rate case ER-2016-0285 and ER-2018-
17 0145 on fuel clause issues.

18 **Q: What is the purpose of your testimony in this proceeding?**

19 A: My testimony supports Evergy Kansas Metro’s request for Commission approval of the
20 2020 ACA amount and associated true-up factor related to the Company’s Energy Cost
21 Adjustment (“ECA”) tariff. I will describe the actual revenues and expenses behind the
22 2020 ECA mechanism and the resulting ACA true-up factor to be effective and applied for
23 the twelve-month period April 1, 2021 to March 31, 2022.

1 **Q: What is the purpose of Evergy Kansas Metro’s ECA tariff?**

2 A: The ECA tariff is designed to capture fuel, purchased power and related expenses for the
3 current calendar year and provide approximate real-time recovery for these expenses
4 subject to an annual true-up. In addition, the Company includes the asset-based off-system
5 sales margin (“OSSM”) in the ECA tariff as an offset to expenses.

6 **Q: Were there any changes made to the ECA tariff in 2020?**

7 A: The Company changed the tariff language in rate case Docket No. 18-KCPE-480-RTS to
8 account for the implementation of the Renewable Energy Rider tariff and the Solar
9 Subscription Rider. For the 2020 filing, there were no customers associated with the Solar
10 Subscription Rider. However beginning in November 2020, there were customers
11 associated with the Renewable Energy Rider (“RER”) tariff. The 2020 ACA includes a
12 reduction to retail purchased power according to the ECA tariff requirements: “Actual total
13 company cost of purchased power incurred during the ECA year recorded in Account 555,
14 and Evergy Metro, Inc.’s actual charges or credits incurred due to participation in markets
15 associated with Regional Transmission Organizations (RTOs) less all costs associated with
16 OSSM excluding amounts associated with portions of purchased power agreements
17 dedicated to specific customers under the Renewable Energy Rider tariff.”

18 **Q: What expenses are used in the calculation of the ECA factors?**

19 A: Fuel, purchased power, emission allowances, renewable energy credits, and wholesale
20 transmission expenses and fees are used in the calculation. The Company uses the
21 following Federal Energy Regulatory Commission (“FERC”) accounts, as described in the
22 ECA tariff, to record these costs:

23 Fuel – FERC Accounts 501, 518 and 547;

1 Purchased Power – FERC Account 555;

2 Emission Allowances and Renewable Energy Credits (“REC”) – FERC Account
3 509; and

4 Transmission Costs and Fees – FERC Accounts 565, 561.4, 561.8, 575.7, and 928.

5 **Q: Are all expenses in these accounts included in the ECA factor calculation?**

6 A: No. Labor is not a part of the ECA calculation. Additionally, retail transmission costs and
7 fees were excluded from the ECA calculation beginning October 1, 2015.

8 **Q: Please explain why labor is excluded.**

9 A: Labor is recovered through base rates rather than through the ECA factors.

10 **Q: Please explain why retail transmission costs and fees are excluded.**

11 A: Effective October 1, 2015, the Company began collecting retail transmission costs and fees
12 through its Transmission Delivery Charge (“TDC”) rider. At that time the Company
13 removed retail transmission from the ECA calculation and included it in the TDC rider.

14 **Q: Why is it important to identify expenses for retail sales versus wholesale sales?**

15 A: It is important because of the different allocation factors. Expenses in support of retail
16 sales are allocated to Kansas based on an energy allocator. This allocation is based on the
17 kilowatt-hour (“kWh”) usage by the retail customers. For example, if Evergy, Inc. bills
18 out retail usage of 100 kWh, of which 47 kWh are Kansas retail usage and 53 kWh are
19 Missouri retail usage, then the Company would allocate 47% (47 kWh / 100 kWh) of the
20 ECA Costs to Kansas retail.

21 Expenses in support of wholesale (*e.g.*, off-system sales) are allocated to Kansas
22 based on the Unused Energy (“UE1”) allocator, in accordance with the Stipulation and
23 Agreement in the Company’s 2007 rate case, Docket No. 07-KCPE-905-RTS. Schedule

EAH-1 contains the calculation of the UE1 allocator for 2020.

Q: How does the Company allocate costs between retail and wholesale?

A: Through a post-analysis tool, the Company splits all sources of power (generation and purchases) between retail and wholesale transactions. The post-analysis tool assigns minimum load obligations for coal units, nuclear power and wind power (owned and purchase power agreements) to its retail customers first. Once retail load has been matched with the above sources of power, the post-analysis tool continues to assign cost until all sales (retail and wholesale) are completed. Transmission costs and fees are allocated to either retail or wholesale based on direct identification of which type of sale was supported or allocated based on the percentage of kWh sales if direct identification cannot be made.

Q: What was the total amount of fuel, purchased power and related expenses for Evergy Kansas Metro retail customers for 2020?

A: Confidential Schedule EAH-2 contains the summary of actual costs for all Evergy Metro Retail customers, Requirements Sales for Resale customers and Bulk Power Sales customers not included in the asset-based OSSM from Bulk Power Sales. The total cost of fuel, purchased power and related expenses to serve Kansas retail customers in 2020 was ** [REDACTED] **.

Q: What is the asset-based OSSM from Bulk Power Sales?

A: The asset-based OSSM is the revenue less cost from the sale of generated electricity not used by retail customers. It is the margin made on sales to non-retail customers of electricity that is tied to Evergy Metro's generating and/or transmission assets. The Kansas portion of this margin is applied to the ECA Costs for the Kansas retail customer.

1 **Q: How is the OSSM component of the ECA tariff calculated?**

2 A: OSSM is the off-system sales revenue recorded in FERC Account 447 for the sale of
3 electricity to non-retail customers less associated costs related to generation, purchased
4 power and transmission of that electricity. The post-analysis tool results, described
5 previously, determine the cost of generating the power and purchased power positions to
6 serve these sales. The allocated portion of transmission expense and associated fees is also
7 included in the OSSM calculation.

8 **Q: Why is transmission expense included in the OSSM calculation of the ECA tariff**
9 **when Evergy Kansas Metro has a TDC rider?**

10 A: The TDC rider is designed to capture and recover transmission expense associated with
11 *retail* service. The OSSM calculation is designed to capture the margin associated with
12 off-system sales. Therefore, transmission expense associated with off-system sales must
13 be included in the calculation to determine OSSM.

14 **Q: How is the Kansas portion of the OSSM applied to Kansas retail customers?**

15 A: The Kansas portion of the OSSM is applied against the ECA Costs included in the ECA
16 tariff calculation. The actual Kansas portion of the OSSM for 2020 was **\$[REDACTED]**.

17 **Q: How does the Company recover the ECA Costs from its Kansas retail customers?**

18 A: As described in the testimony of Ms. Jessica Tucker, Evergy Kansas Metro calculates an
19 ECA rate per kWh for each calendar month (“ECA factor”) on a quarterly basis. The ECA
20 factors are submitted to the Commission on or before the 20th day of the month preceding
21 each calendar quarter. The Company bills its retail customers as a separate line item based
22 on the customers’ kWh usage for each month.

23 **Q: How does the Company record revenue from its retail customers, including ECA**

1 **revenue?**

2 A: Evergy Kansas Metro records ECA revenue as a component of retail revenue in FERC
3 Accounts 440, 442 and 444. In addition, the Company records retail revenue by rate
4 jurisdiction based on customer service address, which allows the Company to record retail
5 usage by rate jurisdiction.

6 **Q: How does Evergy Kansas Metro compare the amount of ECA revenue billed to actual**
7 **ECA Costs incurred?**

8 A: Each month, the Company's accounting department calculates the ECA revenue over- or
9 under-collection in accordance with Evergy Kansas Metro's ECA tariff. The ECA revenue
10 received is compared to the Kansas retail allocation of the actual fuel, purchased power,
11 less the Kansas allocation of OSSM.

12 **Q: For the ECA components described above, how much did the Company record in**
13 **2020 in ECA revenue, ECA Costs and OSSM?**

14 A: Evergy Kansas Metro received ECA revenue from its Kansas retail customers of
15 \$99,376,235 applicable to the 2020 ECA year. As explained above, actual ECA Costs
16 were **\$[REDACTED]** and the OSSM component was **\$[REDACTED]**. The sum of these
17 numbers: revenue of \$99,376,235 less the Kansas portion of costs **\$[REDACTED]** offset
18 by the Kansas portion of OSSM **\$[REDACTED]** or (\$14,897,532) represents the amount
19 the Company has under-recovered from its Kansas retail customers.

1 **Q: Has the Company collected the 2018 ACA under-recovery of \$6,901,525 from Kansas**
2 **retail customers?**

3 A: In accordance with the ECA tariff, Evergy Kansas Metro collected \$6,900,431, which is
4 \$1,094 less than the 2018 under-recovery of \$6,901,525, between April 1, 2019 through
5 March 31, 2020, from its Kansas retail customers.

6 **Q: Is the Company including any amount in this 2020 ACA filing related to the 2018**
7 **ACA under-recovery?**

8 A: Yes. Since the collection period for the 2018 ACA is complete and in accordance with the
9 ECA tariff, the Company will add the above mentioned 2018 ACA under-recovery of
10 \$1,094 to the 2020 ACA total under-collection to be recovered from Kansas retail
11 customers through the ACA factor between April 2021 through March 2022.

12 **Q: What is the total under-recovery for the 2020 ACA year and the true-up from the**
13 **2018 ACA year?**

14 A: The total under-collection for 2020 is \$14,898,626 (\$14,897,532 + \$1,094).

15 **Q: What is the Company recommending for the under-recovery of \$14,898,626?**

16 A: Evergy Kansas Metro is recommending that the Commission approve for Kansas retail
17 customers to reimburse the under-recovery amount over a twelve-month period beginning
18 April 1, 2021 in accordance with the Company's ECA tariff. As shown in Confidential
19 Schedule EAH-2, this under-collection results in an ACA factor of \$0.00233 per kWh
20 which would be added to the ECA factors for each month beginning April 2021 through
21 March 2022.

22 **Q: Has the Company been reimbursed by the Kansas retail customers for the 2019 ACA**
23 **under-recovery of \$12,307,596?**

1 A: In accordance with the ECA tariff, Evergy Kansas Metro is being reimbursed for the under-
2 recovery as part of the ACA true-up factor applicable from April 1, 2020 through March
3 31, 2021.

4 **Q: Is the Company including any amount in this 2020 ACA filing related to the 2019**
5 **ACA under-recovery?**

6 A: No. Since the reimbursement period is not completed at the time of this filing, the
7 Company is not including a true-up amount in this filing. Evergy Kansas Metro intends to
8 include any true-up to the 2019 ACA under-recovery in its March 1, 2022 filing for the
9 2021 ACA.

10 **Q: Are there any additional exhibits filed with this ACA Application prepared by you or**
11 **prepared under your direct supervision?**

12 A: Yes, Confidential Schedule EAH-3 contains the detailed ECA calculation for 2020.

13 **Q: Does that conclude your testimony?**

14 A: Yes, it does.

**BEFORE THE CORPORATION COMMISSION
OF THE STATE OF KANSAS**

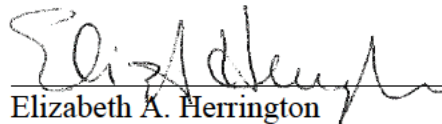
**In the Matter of the Application of Evergy
Metro, Inc. d/b/a Evergy Kansas Metro for
approval of 2020 Actual Cost Adjustment
("ACA")**)
)
) **Docket No. 21-EKME-____-ACA**
)
)

AFFIDAVIT OF ELIZABETH A. HERRINGTON


STATE OF MISSOURI)
) ss
COUNTY OF JACKSON)

Elizabeth A. Herrington, being first duly sworn on her oath, states:

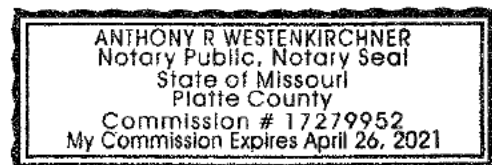
1. My name is Elizabeth A. Herrington. I work in Kansas City, Missouri, and I am employed by Evergy, Inc. as Director, Power, Energy and Revenue Accounting.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Evergy Kansas Metro consisting of nine (9) pages, having been prepared in written form for introduction into evidence in the above-captioned docket.
3. I have knowledge of the matters set forth therein. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded, including any attachments thereto, are true and accurate to the best of my knowledge, information and belief.


Elizabeth A. Herrington

Subscribed and sworn before me this 1st day of March 2021.


Notary Public

My commission expires: 4/26/2021



EVERGY METRO, INC. d/b/a EVERGY KANSAS METRO
ENERGY COST ADJUSTMENT (SCHEDULE ECA)
UNUSED ENERGY ALLOCATOR FOR KANSAS (UE1)

ACTUAL FOR 2020

Unused Energy Allocator				
Calculated using 12 months ended December 2020				
	Missouri	Kansas	FERC	Total
Demand Allocator (D1) - 12CP				
2454.2 Load (MW)	1,269.6	1,181.1	3.5	2,454.2
Demand Allocator D1	51.73%	48.13%	0.14%	100.00%
Energy w/ Losses Allocator (E1)				
Energy Used (MWH)	8,500,340	6,571,021	23,656	15,095,017
Energy w/ Losses Allocator E1	56.31%	43.53%	0.16%	100.00%
Unused Energy w/ Losses Allocator (UE1)				
Available Capacity (MW)				4,481
Demand Allocator (D1)	51.73%	48.13%	0.14%	100.00%
Max Total Peak Allocated Using D1 Factors (MW)	2,318.0	2,156.4	6.4	4,480.8
x Hours in Year (leap year = 366)	8784	8784	8784	8784
Available Energy (MWH)	20,361,421	18,942,087	56,132	39,359,640
- Energy Used (MWH)	8,500,340	6,571,021	23,656	15,095,017
Unused Energy (MWH)	11,861,081	12,371,066	32,476	24,264,623
Unused Energy w/ Losses Allocator UE1	48.8822%	50.9840%	0.1338%	100.0000%

Demand Allocators				
Coincident Peaks Includes Losses Includes DSM (MW)				
	CoinMOPeak	CoinKSPeak	CoinResale	System Peak
Jan-20	1,296	1,153	3	2,452
Feb-20	1,321	1,160	3	2,484
Mar-20	1,054	833	3	1,890
Apr-20	963	853	3	1,819
May-20	1,044	1,027	3	2,074
Jun-20	1,460	1,548	4	3,012
Jul-20	1,620	1,575	5	3,200
Aug-20	1,628	1,498	4	3,130
Sep-20	1,387	1,498	4	2,889
Oct-20	1,168	1,086	3	2,257
Nov-20	1,115	914	3	2,032
Dec-20	1,179	1,029	3	2,211
MAX	1,628	1,575	5	3,200
TOTAL	15,235	14,173	42	29,450
Average	1,269.6	1,181.1	3.5	2,454.2

Jurisdictional COS for Revenue

Production and Transmission Demand Allocators (D1, D2)

Jurisdiction	12-CP Loads	D1, D2 Allocator
Missouri	1,269.6	51.73%
Kansas	1,181.1	48.13%
SFR	3.5	0.14%
Total	2,454.2	100.0000%

Energy Allocators		
12 Months Ending December 2020 Actual ENERGY WITH LOSSES (E1)		
	MWH	E1 Allocator
Missouri	8,500,340	56.3122%
Kansas	6,571,021	43.5311%
Sales for Resale	23,656	0.1567%
TOTAL	15,095,017	100.0000%
MO Retail loss %	7.6550%	
KS Retail loss %	8.4810%	
MO SFR loss %	8.1874%	
ENERGY WITHOUT LOSSES (E2)		
	MWH	E2 Allocator
Missouri	8,053,770	56.5329%
Kansas	6,170,121	43.3107%
Sales for Resale	22,284	0.1564%
TOTAL	14,246,175	100.0000%
Losses to allocate	848,842	
	15,095,017	

EVERGY KANSAS METRO (f/k/a KANSAS CITY POWER & LIGHT COMPANY)
ENERGY COST ADJUSTMENT (SCHEDULE ECA)

SCHEDULE ECA ACTUAL VALUES	Actual Jan-20	Actual Feb-20	Actual Mar-20	Actual Apr-20	Actual May-20	Actual Jun-20	Actual Jul-20	Actual Aug-20	Actual Sep-20	Actual Oct-20	Actual Nov-20	Actual Dec-20	Actual 2020 Total
Actual Costs for all Retail, Requirements Sales for Resale, and Bulk Power Sales Customers not included in the asset-based Off-System Sales Margin from Bulk Power Sales:													
1. Actual cost nuclear and fossil fuel Account 501 Coal Account 518 Nuclear Account 547 Gas / Oil	F _A												
2. Actual cost purchased power Account 555 Purchased Power including RTO Participation	P _A												
3. Actual cost emission allowances	E _A												
4. Actual transmission cost Account 565 Transmission by Others Accts 561, 575, 928 Fees	T _A	Retail transmission costs that were previously collected in the ECA are now collected through the TDC.											
5. Actual Revenue not in OSSM	BPR _A												
5a. Actual cost for non-asset based sales to Bulk Power Customers	NABPC _A												
6. Total (Lines 1+2+3+4-5-5a)													
7. Actual kWhs to be delivered to all Evergy Metro Retail and Requirements Sales for Resale Customers	S _A	1,189,299,230	1,119,953,689	1,068,654,417	930,434,254	1,059,797,237	1,366,154,777	1,510,938,609	1,407,916,725	1,149,256,811	1,075,854,394	1,058,436,335	14,104,620,229
8. Actual annual kWhs to be delivered to all Kansas Retail Customers	S _{AK}	537,505,844	485,385,694	451,021,648	400,969,906	465,274,736	609,799,885	673,791,471	619,274,929	504,068,859	458,599,934	448,631,600	6,162,763,122
9. Kansas Energy Allocation (Line 8 / Line 7)		0.45200	0.43340	0.42200	0.43090	0.43900	0.44640	0.44590	0.43990	0.43860	0.42630	0.42390	0.43530
10. Kansas Portion of Costs (Line 6 x Line 9)													
11. Actual asset-based Off-System Sales Margin from Bulk Power Sales (OSSM)													
12. Actual Unused Energy Allocator for Kansas UE1		50.9840%	50.9840%	50.9840%	50.9840%	50.9840%	50.9840%	50.9840%	50.9840%	50.9840%	50.9840%	50.9840%	
13. Actual Kansas allocation of OSSM (Line 11 x Line 12)	OSSM _A												
14. Net Kansas Cost (Line 10 - Line 13)		\$ 11,197,328	\$ 9,868,506	\$ 9,575,200	\$ 8,935,692	\$ 6,447,721	\$ 13,212,975	\$ 12,963,742	\$ 10,464,694	\$ 7,401,990	\$ 7,657,219	\$ 8,141,708	\$ 114,273,767
15. ECA Revenue Collected excluding True-up		\$ 8,933,365	\$ 7,567,184	\$ 7,784,641	\$ 7,261,559	\$ 7,472,317	\$ 10,659,299	\$ 10,376,392	\$ 9,270,556	\$ 8,196,152	\$ 7,608,168	\$ 6,864,068	\$ 99,376,235
16. Over (Under) Collected (Line 15 - Line 14)		\$ (2,263,963)	\$ (2,301,322)	\$ (1,790,558)	\$ (1,674,133)	\$ 1,024,596	\$ (2,553,676)	\$ (2,587,349)	\$ (1,194,139)	\$ 794,162	\$ (49,051)	\$ (1,277,641)	\$ (14,897,532)
17. True-up Amt Previous ECA year	TRUE _{PRIOR}												(1,094)
18. True-up Amt Total (Line 16 + Line 17 + Line 18)	TRUE _A												\$ (14,898,626)
19. True-up kWhs	S _{RUE}												6,405,464,450
20. True-up Component of the ECA (\$/kWh) (- Line 15 / Line 16)													\$ 0.00233

CONFIDENTIAL
EVERGY KANSAS METRO (formerly KCP&L)
ENERGY COST ADJUSTMENT
For application to all Evergy Kansas Metro Retail Rate Schedules

ACA	Component	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	2020
		Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals
	Cost of Fuel for: (1) Retail, (2) Requirements Sales for Resale, (3) Bulk Power Sales not in OSSM													
	FA Accounts 501, 518, and 547													
	Account 501													
	+ Production Fuel													
	+ Fuel Additives													
	+ Fuel Residuals													
	+ Non-labor Fuel Handling													
	+ Natural Gas Option Premiums													
	+ Natural Gas Hedge Settlement													
	+ Total 501 (excluding labor)													
	Account 518													
	+ Production Fuel													
	+ Fuel Additives													
	+ Fuel Residuals													
	+ Non-labor Fuel Handling													
	+ Total 518 (excluding labor)													
	Account 547													
	+ Production Fuel													
	+ Fuel Additives													
	+ Fuel Residuals													
	+ Non-labor Fuel Handling													
	+ Natural Gas Option Premiums													
	+ Natural Gas Hedge Settlement													
	+ Total 547 (excluding labor)													
	Total FA =													
	Cost of Purchased Power & RTO for: (1) Retail, (2) Requirements Sales for Resale, (3) Bulk Power Sales not in OSSM													
	PA Account 555													
	Capacity Demand Purchases													
	+ Associated Electric Cooperative, Inc.													
	+ Higginsville													
	+ Chanute													
	+ Morgan Stanley Capital Group													
	+ Dogwood													
	+ Total Capacity Demand Purchases													
	Energy Purchases													
	+ Border Customers													
	+ Capacity Energy													
	+ CNPPID HYDRO PPA PREMIUM													
	- Less RER Subscribed													
	+ Muni. Capacity Energy													
	+ Parallel Generation (Co-generators)													
	+ Hampton Biofuel													
	+ Non-Firm (excl SPP Netting)													
	+ SPP Netting													
	+ Reconciliation to General Ledger													
	+ Energy Purchases for Term Deals included above													
	+ Total Energy Purchases													
	SPP Loss Charges													
	Independence Bulk Power Sales not in OSSM (MWh)													
	+ Total Wholesale Energy Sales (MWh) + Indep BPS													
	Percent of Indep BPS to Wholesale Energy Sales + Indep BPS													
	x SPP Loss Charges (Total)													
	+ SPP Loss Charges (Independence BPS not in OSSM)													
	Purchases: Purchases for Resale													
	+ PURCHASES: Purchases for Resale (BPS not in OSSM)													
	= Non-Firm Energy PURCHASES													
	RTO Charges/Credits													
	Total Revenue Neutrality Uplift													
	+ Total MWh													
	RNU \$/MWh													
	* Retail, RSIR, BPS (MWh)													
	+ Revenue Neutrality Uplift													
	Total PA =													

CONFIDENTIAL
EVERGY KANSAS METRO (formerly KCP&L)
ENERGY COST ADJUSTMENT
For application to all Evergy Kansas Metro Retail Rate Schedules

ACA	Component	Jan-20	Feb-20	Mar-20	Apr-20	May-20	Jun-20	Jul-20	Aug-20	Sep-20	Oct-20	Nov-20	Dec-20	2020
		Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals

Cost of Emission Allowances for: (1) Retail, (2) Requirements Sales for Resale, (3) Bulk Power Sales not in OSSM

EA Account 509
+ SO2 Amortization
+ SO2 Allowances
+ NOx Allowances
+ NOx Seasonal Allowances
+ Wind & Solar Renewable Energy Credits

Total EA =

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Cost of Transmission + RTO, FERC, NERC for: (1) Retail, (2) Requirements Sales for Resale, (3) Bulk Power Sales not in OSSM

TA Accounts 561, 565, 575, and 928
Account 561
NERC Assessment and SPP Region Assessment
+ NERC Assessment and SPP Region Assessment Fees

RTO fees
Total SPP RTO Administrative Fees on Retail Load
x Percent allocated to Scheduling, System Control, and Dispatch Svcs
+ Scheduling, System Control and Dispatch Services

Total SPP RTO Administrative Fees on Retail Load
x Percent allocated to LT Reliability Planning & Standards Dvlpmnt Svcs
+ Long-Term Reliability Planning and Standards Development Services

+ Total 561 RTO fees
+ SPP RTO refund included in ECA (A/C 561xxx)
+ Total Account 561

Account 565
RTO & Transmission Costs
+ 565 RTO - SPP Transmission Base Plan Funding
+ 566 RTO - SPP Z2 Reimbursements

Transmission Costs to be recorded in 565 for Retail, Requirements Sales for Resale, and Bulk Power Sales not in OSSM
+ 565 Other Transmission Costs

+ Reconciliation to General Ledger

+ Total Account 565

Account 575
RTO
Total SPP RTO Administrative Fees on Retail Load
x Percent allocated to Market Facilitation, Monitoring & Compliance Svcs
+ Market Facilitation, Monitoring and Compliance Services
+ SPP RTO refund included in ECA (A/C 575xxx)
+ Total Account 575

Account 928
RTO
+ 928 RTO

FERC
FERC Assessment
+ Total MWh
928 FERC \$/MWh
x Retail, RS/R, BPS (MWh)
+ 928 FERC

+ Total Account 928

Total TA = + Total Cost of Transmission & RTO, FERC, and NERC

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CONFIDENTIAL
EVERGY KANSAS METRO (formerly KCP&L)
ENERGY COST ADJUSTMENT
For application to all Evergy Kansas Metro Retail Rate Schedules

ACA	Component	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals
Revenue from Asset-based Bulk Power Sales not in OSSM														
BPRA Account 447														
Capacity Demand Sales														
+ INDN Capacity Demand Exchange														
+ Springfield														
+ Chanute														
+ Total Capacity Demand Sales														
Energy Sales														
+ Capacity Energy Exchange [City of Independence]														
+ Independence Load Regulation														
+ KMEA Load Following														
+ SPP IM Real-Time														
+ Springfield Energy Capacity														
+ Chanute Energy Sales Revenue														
+ Non-Firm (excl SPP Netting)														
+ SPP Netting														
+ Reconciliation to General Ledger														
+ Total Energy Sales														
Miscellaneous														
+ Independence														
+ GMO OPTION (reclassify in July 2014)														
+ Chanute Fixed Costs Revenue														
+ Total Miscellaneous														
SPP Loss Revenues														
+ Total SPP Loss Revenues														
Total BPRA = Revenue from Asset based Bulk Power Sales not in OSSM														
Cost of Non-Asset based Sales to Bulk Power customers														
NABPCA Account 555														
Q Expenses														
Total NABPCA =														
kWh for all Retail and Requirements Sales for Resale														
SAK Kansas kWh		537,505,844	485,385,694	451,021,648	400,969,906	465,274,736	609,799,885	673,791,471	619,274,929	504,068,859	458,599,934	448,631,600	508,438,616	6,162,763,122
SAT Total kWh		1,189,299,230	1,119,953,689	1,068,654,417	930,434,254	1,059,797,237	1,366,154,777	1,510,938,609	1,407,916,725	1,149,256,811	1,075,854,394	1,058,436,335	1,167,923,751	14,104,620,229
SAK/SAT		45.20%	43.34%	42.20%	43.09%	43.90%	44.64%	44.59%	43.99%	43.86%	42.63%	42.39%	43.53%	43.69%

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		Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals

Asset-based Off-System Sales Margin from Bulk Power Sales														
OSSM Total OSSM Revenue and Expense														
Revenue - Account 447														
+ Post Analysis Total Sales														
+ SPP Loss Revenues														
+ BookOuts (B's, BF's, and QF's)														
+ Capacity Sales Demand - Eudora from Chanute, GMO, S'ville to KMEA														
+ Eudora Misc. Fixed Costs														
+ SPP Netting														
+ Border Customers Energy Sales														
+ MIDAS Bulk Power Sales														
+ Sales of Purchases for Resale														
+ Total OSSM Revenue														
Expense														
Fuel Expense - Accounts 501, 518, and 547														
Account 501														
+ Production Fuel														
+ Fuel Additives														
+ Fuel Residuals														
+ Non-labor Fuel Handling														
+ Total 501 (excluding labor)														
Account 518														
+ Production Fuel														
+ Fuel Additives														
+ Fuel Residuals														
+ Non-labor Fuel Handling														
+ Total 518 (excluding labor)														
Account 547														
+ Production Fuel														
+ Fuel Additives														
+ Fuel Residuals														
+ Non-labor Fuel Handling														
+ Total 547 (excluding labor)														
+ Total Fuel Expense														
Purchased Power Expense - Account 555														
Energy Purchases														
+ Firm Capacity Energy														
+ Energy Purchases for Term Deals														
+ Total Energy Purchases														
SPP Loss Charges														
Bulk Power Sales in OSSM (MWh)														
+ Total Wholesale Energy Sales (MWh) + Indep BPS														
Percentage of BPS in OSSM to Total Wholesale Energy Sales														
x SPP Loss Charges (Total)														
+ SPP Loss Charges (BPS in OSSM)														
Purchases: Purchases for Resale														
SPP Netting														
RTO Charges/(Credits)														
Total Revenue Neutrality Uplift														
+ Total MWh														
RNU \$/MWh														
+ Sales MWh														
+ Revenue Neutrality Uplift														
BookOuts (B's, BF's, and QF's)														
+ Total Purchased Power														
Emission Allowances - Account 509														
+ SO2 Allowances														
+ NOx Allowances														
+ NOx Seasonal Allowances														
+ Total Emission Allowances														

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ACA Component		Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals
Cost of Transmission & RTO, FERC, and NERC - Account 561														
RTO fees														
Total SPP RTO Administrative Fees on Point to Po														
x Percent allocated to Scheduling, System Ctrl & Dispatch Svcs														
+ Scheduling, System Control and Dispatch Services														
Total SPP RTO Administrative Fees on Point to Po														
x Percent allocated to LT Reliability Planning & Stds Dvlpmnt Svcs														
+ Long-Term Reliability Planning and Standards Development Svcs														
+ Total Account 561														
Account 565														
RTO fees														
+ 565 RTO - SPP Transmission Base Plan Funding and Z2 Reimburse														
+ Total of Other Transmission costs to be recorded in 565														
+ Total Account 565														
Account 575														
RTO fees														
Total SPP RTO Administrative Fees on Point to Poin														
x Percent allocated to Mkt Facilitation, Monitoring & Compliance Svcs														
+ Market Facilitation, Monitoring and Compliance Service														
+ Total Account 575														
Account 928														
FERC fees														
FERC Assessment														
÷ Total MWh														
FERC fee \$/MWh														
x MIDAS Non-Firm Sales (MWh)														
+ 928 FERC														
+ Total Account 928														
+ Total Cost of Transmission & RTO, FERC, and NERC														
- Total OSSM Expense														
>> Total OSSM														
Median OSSM														
x Mean to Median Adjustment Factor														
=														
OSSMK x Unused Energy (UE1) Allocator														
Total OSSMK														
=														

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		Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals	Actuals
	SAK Kansas kWh													
	Total SAK =													
ECAP	Calculation													
	FA Fuel													
	PA Purchased Power													
	EP Emission Allowances													
	TA Transmission													
	(FA + PA + EA + TA)													
	BPRA Bulk Power Revenue													
	NABPCA Non-asset Based Costs													
	((FA + PA + EA + TA) - BPRA) - NABPCA													
	SA Retail + Requirements Sales kWhs													
	((FA + PA + EA + TA) - BPRA - NABPCA) / SA													
	Kansas portion of Cost													
	less Kansas portion of OSSM													
	Net Kansas Cost	\$ 11,197,328	\$ 9,868,506	\$ 9,575,200	\$ 8,935,692	\$ 6,447,721	\$ 13,212,975	\$ 12,963,742	\$ 10,464,694	\$ 7,401,990	\$ 7,657,219	\$ 8,141,708	\$ 8,406,992	\$ 114,273,767
	Projected Fuel Cost Component													
	Projected OSSM Component													
	True-up Factor	0.00108	0.00108	0.00108	0.00192	0.00192	0.00192	0.00192	0.00192	0.00192	0.00192	0.00192	0.00192	0.00192
ECA _A	Factors in Rates	\$ 0.01770	\$ 0.01667	\$ 0.01834	\$ 0.02003	\$ 0.01798	\$ 0.01940	\$ 0.01732	\$ 0.01689	\$ 0.01818	\$ 0.01851	\$ 0.01722	\$ 0.01644	
	Retail Cost Collected (Fuel Component)													
	Rounding Adjustment													
	OSSM Given Back													
	Revenue excluding True-up Amount	\$ 8,933,365	\$ 7,567,184	\$ 7,784,641	\$ 7,261,559	\$ 7,472,317	\$ 10,659,299	\$ 10,376,392	\$ 9,270,556	\$ 8,196,152	\$ 7,608,168	\$ 6,864,068	\$ 7,382,536	\$ 99,376,235
	True-up Revenue (estimated)	580,506	524,217	487,103	769,862	893,327	1,170,816	1,293,680	1,189,008	967,812	880,512	861,373	976,202	10,594,418
ECAREV _A		\$ 9,513,871	\$ 8,091,400	\$ 8,271,745	\$ 8,031,421	\$ 8,365,644	\$ 11,830,114	\$ 11,670,072	\$ 10,459,563	\$ 9,163,964	\$ 8,488,680	\$ 7,725,441	\$ 8,358,738	\$ 109,970,653
	2020 Over (Under) Collection	\$ (2,263,963)	(2,301,322)	(1,790,558)	(1,674,133)	1,024,596	(2,553,676)	(2,587,349)	(1,194,139)	794,162	(49,051)	(1,277,641)	(1,024,457)	(14,897,532)
TRUE _A	2018 Remaining Balance - Over (Under) Collection													(1,094)
														\$ (14,898,626)
S _{RUE}	Projected kWhs for Kansas Retail customers for April 2021 - March 2022													6,405,464,450
-TRUE _A / S _{RUE}	Factor to add													\$ 0.00233